

Worksheet
Documentation of Land Use Plan Conformance and NEPA Adequacy (DNA)
 U.S. Department of the Interior
 Bureau of Land Management (BLM)

Note: This worksheet is to be completed consistent with the policies stated in the Instruction Memorandum entitled "Documentation of Land Use Plan Conformance and National Environmental Policy Act (NEPA) Adequacy" transmitting this worksheet and the "Guidelines for Using the DNA Worksheet" located at the end of the worksheet. (Note: The signed CONCLUSION at the end of this worksheet is part of an interim step in the BLM's internal analysis process and does not constitute an appealable decision.)

A. BLM Office: Klamath Falls R.A. OR-014 **Permit/Lease:** #3601013

Proposed Action Title/Type: The proposed action is to renew an expiring 10-year grazing permit/lease (#361013) for Michael G. Laidet for approximately 840 acres of BLM administered land known as the Cheyne Allotment (0811). The permit/lease expires on 2/28/03 and is being renewed in accordance with the grazing regulations at 43 Code of Federal Regulations (CFR) §4110.1; §4110.2-1(a)(1) & (c); §4110.2-2(a); §4130.2; and §4130.3; and other pertinent policy and guidance.

Location of Proposed Action: The BLM Section 15 (Taylor Grazing Act) administered lands that comprise the Cheyne allotment are located about 3 miles north of Bonanza, Oregon, along and adjacent to the Bly Mountain Cut-off Road. This allotment is largely fenced separately from the adjacent private lands, though there is no effective fencing between Cheyne and the allotment directly to the south – McCartie (0860). This also allows cattle access to the relatively high traffic Cut-off Road and is the reason little cattle use has been made over the past 10-15 years.

Description of the Proposed Action: The term of the renewed permit/lease will be 3/1/2003 through 2/28/2013; 10 years as authorized by the current grazing regulations at §4130.2(d). This grazing permit/lease could be changed in the future and reissued with different parameters if information from a future Rangeland Health Standards Assessment (to be discussed later) determines such or future policy or laws dictate different grazing management. The parameters of the renewed grazing permit/lease would be the same as the previous lease and as follows:

<u>ALLOTMENT(#)</u>	<u>LIVESTOCK</u>	<u>GRAZING PERIOD</u>	<u>AUMs</u>
Cheyne (0811)	34 cattle	5/1 - 6/15	51 AUMs

Applicant (if any): Michael Laidet – Permit/lease renewal application signed 9/2/2002.

B. Conformance with the Land Use Plan (LUP) and Consistency with Related Subordinate Implementation Plans

LUP Name*: *Klamath Falls R.A. Resource Management Plan and Environmental Impact Statement* (KFRA RMP/EIS dated September 1994)
 Date Approved: June 1995 via the *Klamath Falls Resource Area Record of Decision and*

*Resource Management Plan and Rangeland Program Summary (KFRA
ROD/RMP/RPS)*

Other document**: None _____

* List applicable LUPs (e.g., Resource Management Plans or applicable amendments).

**List applicable activity, project, management, water quality restoration, or program plans.

☒ **The proposed action is in conformance with the applicable LUPs because it is specifically provided for in the following LUP decisions:**

The KFRA ROD/RMP/RPS states on page 62 to “*Provide for livestock grazing in an environmentally sensitive manner, consistent with other objectives and land use allocations. Resolve resource conflicts and concerns and **ensure that livestock grazing use is consistent with the objectives and direction found in Appendix H (Grazing Management)***” (emphasis added). Also later on that same page is the following: “*Provide for initial levels of livestock grazing within the parameters outlined, by allotment, in Appendix H.*”

The KFRA ROD/RMP/RPS - Appendix H - lists the grazing parameters for the Horton allotment on page H-19. The parameters for the proposed action (grazing permit/lease renewal) are the same as the past grazing permit/lease and the same as that listed in the KFRA ROD/RMP/RPS.

☐ **The proposed action is in conformance with the LUP, even though it is not specifically provided for, because it is clearly consistent with the following LUP decisions (objectives, terms, and conditions) and, if applicable, implementation plan decisions:**

Not Applicable - the action is specifically provided for in the LUP.

C. Identify the applicable NEPA document(s) and other related documents that cover the proposed action.

List by name and date all applicable NEPA documents that cover the proposed action.

Klamath Falls R.A. Resource Management Plan and Environmental Impact Statement (KFRA RMP/EIS dated September 1994) approved via the June 1995 *Klamath Falls Resource Area Record of Decision and Resource Management Plan and Rangeland Program Summary* (KFRA ROD/RMP/RPS). This is the overall land use plan (LUP) for the Klamath Falls Resource Area.

Klamath Falls Resource Area Fire Management EA #OR-014-94-09 (June 10, 1994)

List by name and date other documentation relevant to the proposed action (e.g., source drinking water assessments, biological assessment, biological opinion, watershed assessment, allotment evaluation, rangeland health standard's assessment and determinations, and monitoring the report).

In 1995, the grazing on this allotment was determined by the BLM to be a “no-effect” impact to the two endangered sucker species in the Klamath Basin.

D. NEPA Adequacy Criteria

1. Is the current proposed action substantially the same action (or is a part of that action) as previously analyzed?

Documentation of answer and explanation:

The proposed action (permit/lease re-issuance) is consistent with, if not identical to, the grazing management identified in the KFRA RMP/EIS Preferred Alternative - called the “Proposed Resource Management Plan” or PRMP (also called the “Final RMP/EIS”). Specifics by allotment are found in Appendix L, with the Cheyne allotment on page L-19. The preferred alternative was affirmed and implemented by the KFRA ROD/RMP/RPS, where the allotment specific information is found in Appendix H, page H-19. Environmental impacts of grazing, for all alternatives, are found in Chapter 4 - “Environmental Consequences” (4-1 through 4-143) - of the KFRA RMP/EIS. Since the proposed action (permit/lease renewal grazing parameters) and Cheyne allotment were specifically analyzed in the plan, the answer to this NEPA adequacy question must be yes.

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the current proposed action, given current environmental concerns, interests, resource values, and circumstances?

Documentation of answer and explanation:

The proposed action (permit/lease renewal) lies within the range of various alternatives identified and analyzed in the KFRA RMP/EIS (summarized in table S-1 “Comparisons of Allocations and Management by Alternative”, pages 18-50; and S-2 “Summary of Environmental Consequences by Alternative”, pages 52-53). This array and range of alternatives included the No Action alternative (status quo); five other alternatives (A through E) that covered a span of management from a strong emphasis on commodities production to a strong emphasis on resource protection/preservation; and the PRMP that emphasizes a balanced approach of producing an array of socially valuable products within the concept of ecosystem management. Since this plan is relatively recent (1995), it more than adequately reflects “current environmental concerns, interests, and resource values”.

3. Is the existing analysis adequate and are the conclusions adequate in light of any new information or circumstances (including, for example, riparian proper functioning condition [PFC] reports; rangeland health standards assessments; Unified Watershed Assessment categorizations; inventory and monitoring data; most recent Fish and Wildlife Service lists of threatened, endangered, proposed, and candidate species; most recent BLM lists of sensitive species)? Can you reasonably conclude that all new information and all new circumstances are insignificant with regard to analysis of the proposed action?

Documentation of answer and explanation:

A review was conducted to determine if any new information, studies, and/or analyses has been

collected/completed since 1995 that would materially differ from that collected/completed during the RMP/EIS process. No new information was found that would significantly change the substance of the analysis in the RMP/EIS. However, some recent information is available that supports the analysis in that LUP. It is as follows:

In October & November of 2002, an Ecological Site Inventory (ESI) was completed for this allotment as part of an effort to collect baseline vegetation information on low priority, Section 15 grazing allotments in the KFRA. The ESI efforts were recently recommenced in a broad effort to obtain information adequate enough to complete required *Rangeland Health Standards Assessments* on the KFRA's smaller, fragmented grazing allotments - like Cheyne. The ESI information for Cheyne shows that the big majority of the allotment is in late seral to Potential Natural Community (PNC) – functional conditions that fully meet LUP objectives. The only condition exceptions are several small parcels of land acquired in land swaps during the early 1970's. These lands were farmed during private ownership and the vegetation conditions are still highly altered and debatably “functional”. Since this allotment has essentially been un-grazed for 10-15 years, livestock are at present not a condition issue for these areas. For more information on the ESI and current ecological conditions see the Cheyne allotment file.

Over the past couple years, juniper control and some pile burning activities have been done in portions of the allotment, with more possibly planned for the future. Specifically there has been a lot of thinning of smaller juniper trees (<6”), limbing, and some brush thinning in this area in order to reduce the fire hazards in these extensive BLM/private land interface areas. In general, these activities have (or will have) a positive effect on ecological conditions by reducing some of the juniper competition and allowing the more desirable shrub and herbaceous plants some “room” to increase. This juniper control work is consistent with - and to a large extent required by - the KFRA RMP/EIS and subsequent ROD.

The following information is pertinent to the full addressing of this NEPA adequacy question:

- The analyses in the Interior Columbia Basin Ecosystem Management Plan (ICBEMP) has not indicated any new or significant information that would modify the management direction in this allotment; that plan's broad scale not allowing for the specificity of the KFRA RMP.

- Rangeland monitoring studies (or other resource studies) have not been performed on this allotment since it is a low priority “C” (custodial) category allotment that is small in size, fragmented and intermingled with private lands limiting management options. Besides the KFRA wide invasive juniper problem and the old, acquired farm areas noted above, there have been no other indications that the allotment has any critical resource problems that need extensive monitoring. Recent checks during the ESI confirm that condition are good, little if any grazing has occurred in many years, and that conditions are consistent with LUP objectives and appropriate for the perpetuation and/or improvement of the vegetation community even if grazing were to resume.

- In accordance with 43 CFR §4180 and related policy direction, the Klamath Falls Resource Area is in the process of implementing the *Standards for Rangeland Health and Guidelines for Grazing Management* (S&G's), as approved by the Klamath PAC/RAC. A "Rangeland Health Standards Assessment" for the Cheyne allotment is scheduled for completion in fiscal year 2004. The assessment will ascertain whether current management is meeting, not meeting, or making significant progress towards meeting, the 5 Standards for Rangeland Health. The assessment will be based on information currently available at the time of Assessment, particularly the recent ESI information.

To summarize, the existing analysis and subsequent conclusions in the LUP are still considered valid at this time, including the described and analyzed livestock grazing impacts. Likewise, it is reasonable to conclude that the new information and new circumstances are insignificant with regard to the analysis of the proposed action.

4. Do the methodology and analytical approach used in the existing NEPA document(s) continue to be appropriate for the current proposed action?

Documentation of answer and explanation:

The KFRA RMP/EIS, and subsequent ROD/RMP/RPS, designated domestic livestock grazing as a principal or major use for this allotment under the principle of multiple use on a sustained yield basis in accordance with FLPMA. The development of the Proposed Resource Management Plan in the RMP/EIS, as adjusted or affirmed by the ROD/RMP/RPS, meets NEPA standards for impact analysis. The methodology and analyses employed in the RMP/EIS are still considered valid as this planning effort is relatively recent (ROD - June 1995) and considered up to date procedurally. The plan is also "maintained" regularly to keep it current by incorporating new information, updating for new policies and procedures, and correcting errors as they are found. In addition, all the rangeland monitoring, studies, and survey methods utilized in the resource area prior to and during the planning process continue to be accepted (or required) BLM methods and procedures.

5. Are the direct and indirect impacts of the current proposed action substantially unchanged from those identified in the existing NEPA document(s)? Does the existing NEPA document sufficiently analyze site-specific impacts related to the current proposed action?

Documentation of answer and explanation:

The proposed action is consistent with the impact analysis KFRA RMP/EIS, as affirmed or adjusted by the ROD/RMP/RPS. The impacts of livestock grazing were analyzed in most of the major sections of Chapter 4 - Environmental Consequences (pages 4-1 through 4-143) in the RMP/EIS. No new information has come to light since completion of the plan that would indicate that the previously analyzed direct/indirect impacts would be substantially different, though there are some recent (2002) indications that the impacts of livestock grazing are *less* than analyzed.

The details of the proposed action were also covered specifically in Appendix H - *Grazing Management and Rangeland Program Summary* (page H-19) of the KFRA ROD/RMP/RPS.

During the pre-RMP process in 1990-91, a series of IDT meetings were held to specifically address the formulation of objectives for every grazing allotment in the KFRA. These objectives were based on the monitoring (or related) data collected, past allotment categorization efforts (1982, as subsequently revised), as well as professional judgment based on field observations up to that time. One “Identified Resources Conflicts/Concerns” was listed for Cheyenne, with the accompanying “Management Objectives” - as follows:

<u>Identified Resources Conflicts/Concerns</u>	<u>Management Objectives</u>
Critical deer winter range occurs in allotment.	Management systems should reflect the importance of deer winter range.

The specific rationale supporting this objective is not known, as no records from the noted IDT process exists (or can be found). The rationales, however, can be approximated based on current information. The BLM lands in the Bly Mountain Cut-off area are entirely surrounded by private lands owned by hundreds, if not a thousand or more, private individuals. As such, the BLM lands are highly important as “reservoirs” of relatively unaltered habitat for many wildlife species in the area, particularly deer.

In summary, it is thought at this time, based on current information and judgment, that this NEPA Adequacy “question” is in the affirmative; that the direct and indirect impacts of re-issuing this grazing permit are unchanged from that identified in the LUP and that plan also adequately analyzes the site-specific impacts.

6. Can you conclude without additional analysis or information that the cumulative impacts that would result from implementation of the current proposed action are substantially unchanged from those analyzed in the existing NEPA document(s)?

Documentation of answer and explanation:

The proposed action as analyzed in the PRMP of the KFRA RMP/EIS, as affirmed or adjusted by the ROD/RMP/RPS, would not change analysis of cumulative impacts. Any adverse cumulative impacts are the same as and within the parameters of those identified and accepted in that earlier planning effort for this allotments grazing use, since the proposed action was specifically analyzed in the RMP/EIS. In addition, the analyses in the Interior Columbia Basin Ecosystem Management Plan (ICBEMP) have not indicated any cumulative impacts beyond those anticipated in the earlier analyses. (In addition, the ICBEMP, due to its regional approach, does not have the specificity of the RMP.)

7. Are the public involvement and interagency review associated with existing NEPA document(s) adequately for the current proposed action?

Documentation of answer and explanation:

The KFRA RMP/EIS and ROD/RMP/RPS were distributed to all interested publics and other government agencies for review. Since this proposed permit issuance is as listed in the LUP - and that plan went through all of the appropriate and legally required public/agency review - public involvement is considered at least adequate.

All of those publics/agencies have also been kept informed of plan implementation through periodic planning update reports (i.e. May 1995, October 1997, February 1999, July 2000, and August 2002). These planning updates, or Annual Program Summaries as they are now called, include information on range program and project accomplishments, updates to the RPS, monitoring accomplishment reports, planned activities for the upcoming year, allotment evaluation and Standards and Guidelines assessments scheduling, and other information necessary to allow for adequate public involvement opportunities.

No specific public involvement, or "interested public" status (under the grazing regulations at 43 CFR 4100.0-5), has been requested for this allotment, with the exception of Mr. Laidet, who is the existing lessee and granted automatic status.

E. Interdisciplinary Analysis: Identify those team members conducting or participating in the preparation of this worksheet.

<u>Name</u>	<u>Title</u>	<u>Resource Represented</u>
Bill Lindsey	Rangeland Management Specialist	Author/Range
(See cover sheet for other participants and/or reviewers)		

F. Mitigation Measures: List any applicable mitigation measures that were identified, analyzed, and approved in relevant LUPs and existing NEPA document(s). List the specific mitigation measures or identify an attachment that includes those specific mitigation measures. Document that these applicable mitigation measures must be incorporated and implemented.

None specifically needed beyond the general ones identified in the RMP.

CONCLUSION



Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the existing NEPA documentation fully covers the proposed action and constitute BLM's compliance with the requirements of NEPA.

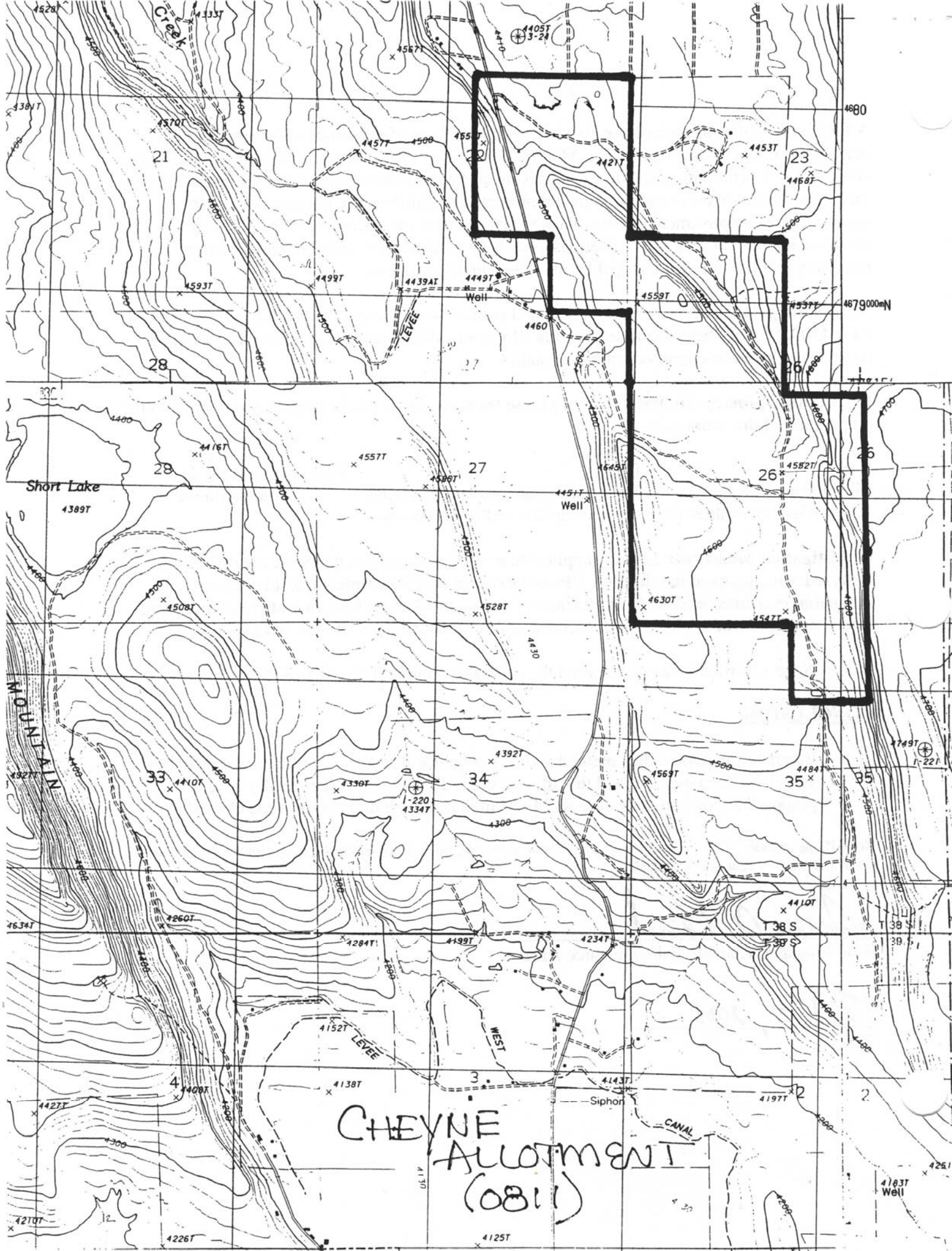
Note: If one or more of the criteria are not met, a conclusion of conformance and/or NEPA adequacy cannot be made and this box cannot be checked.

Teresa A. Raul

Field Manager, Klamath Falls Resource Area

Feb 7, 2003

Date



Klamath Falls Resource Area NEPA Document Routing Slip for Internal Review

Project Name: LAIDET GRAZING LEASE RENEWAL (CHEYNE ALLOTMENT)
 Date Initiated: 12/17/02

Resource or Staff Responsible	Review Priority	Preliminary Review Date/Initials	Comments Attached/Incorporated	Final Review Date/Initials
Manager: Teri Raml	Last			TR
Branch Chief: Barbara Ditman	Second to Last		NONE	BAL 1/23/03
Branch Chief: Larry Frazier	Second to Last			
Branch Chief: Mel Crockett	Second to Last			
Planner/EC: Don Hoffheins, Kathy Lindsey	Third from Last			KL 1/21/02
Range: Bill Lindsey, Dana Eckard		AUTHER		12/17/02
Wild Horses: Tonya Pinckney				
Fire/Air Quality: Joe Foran				
Silviculture: Bill Johnson, Gabi Sommerauer				
Timber: Mike Bechdolt				
Botany/ACEC/Noxious Weeds: Lou Whiteaker		JW 12/19/02	Surveyed in Reg. 4. Silene nutra sep. insectura Pops in exc's 22 & 23	JW 12/19/02
Soils: Jannice & Mike Cutler				
Cultural: Tim Canaday		TC 1/21/03	No surveys needed as long as there's no improvements or ground disturbance	TC 1/21/03
Minerals/HazMat: Tom Nottingham				
lands/Realty: Linda Younger				
Recreation/Visual/Wilderness: Scott Senter				
Hydrology/Riparian: Mike Turaski, Andy Hamilton				
Wildlife/T&E: Gayle Sitter		GS 1/15/03	NONE	GS 1/15/03
Fisheries/T&E: Scott Snedaker				
W/S Rivers: Grant Weidenbach				
Engineering: Brian McCarty				
Survey/Manage: Molly Juillerat				
Clearances/Surveys	Needed	Done/Attached	<p>*This document will not sit on your desk for more than 8 hours. Please check on calendar to make sure that the next person will be available to review the document.</p> <p>**Some resource areas may not apply for all projects. If so, just mark "N/A" in "Review Priority" column.</p>	
Cultural		TC 1/21/03		
Botanical		JW 12/19/02		
T&E, BA & or Consultation				
R-O-W Permits				

2/10/03
 CHANGES
 MADE &
 REPRINTED
 BSL